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October 21, 2011

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

*Via Electronic Filing*

**Re: Notice of Ex Parte Presentations in: *Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, MB Dkt. 00-168; *Examination of the Future of Media and Information Needs of Communities in a Digital Age*, GN Dkt 10-25**

Dear Ms. Dortch,

Pursuant to section 1.1206(b) of the Commission's rules, Free Press, on behalf of the Public Interest Public Airwaves Coalition, submits this notice regarding two *ex parte* communications in the above referenced dockets.

On October 20, 2011, Angela Campbell and Blake Reid of the Georgetown Institute for Public Representation, Andrew Jay Schwartzman of Media Access Project, Cheryl Leanza of the Office of Communication of the United Church of Christ, Inc., and Corie Wright of Free Press met with the following members of Chairman Julius Genachowski's staff: Edward Lazarus, Chief of Staff; Sherrese Smith, Senior Counsel & Legal Advisor; and Jessica Almond, Special Counsel to the Chairman.

In the meeting, the public interest groups expressed support for the broadcast disclosure item scheduled for the Commission's October 27th open meeting, and specifically for measures requiring online access to broadcaster's existing public files, as well as improved and uniform program reporting obligations. They explained that their support for the FCC's current plan to move forward with a combined notice of proposed rulemaking and notice of inquiry is predicated on a timeline that includes a final order in March and rules that will be in effect by June 2012. The Chairman's staff's assured the groups that both the improved broadcaster reporting and modernized public file system are a high priority for the Chairman and that they anticipate Commission action within that timeframe.

With regard to broadcasters' public files, the groups reiterated their longstanding support for modernization of the public file system by providing access to such files online. They encouraged the Commission to grant the petition for reconsideration filed by Campaign Legal Center seeking inclusion of the existing political file in any general online public file requirement. Not only would online access facilitate community access to the file, it would also reduce the burden of maintaining paper files, as well as the burden on station staff who must currently chaperone any in-person examination of these files by members of the public or by campaign staff seeking to view the political file during election periods. Given the

convenience and ubiquity of the internet, online access to the public files would be easier and more cost-effective for broadcasters, the public, and other interested parties.

The groups also explained that broadcasters' existing quarterly issues/programs lists are ill-suited to their fundamental purpose, which is to enable the public to appraise how much and what types of local programming broadcasters air to serve their communities of license. The lack of uniformity and standardization of the current issues/programs lists means that broadcasters arbitrarily and inconsistently list information about their local programming, and frequently list activities and events that have nothing to do broadcast programming whatsoever. The findings and goals laid out in the recent FCC staff report on the Information Needs of Communities,<sup>1</sup> coupled with the extensive record already generated in the existing enhanced disclosure docket, provide a strong basis for prompt replacement of broadcasters' existing issues/programs lists with improved and uniform reporting on core local programming.

The groups expressed optimism that broadcasters would engage constructively to adopt modernized public file and reporting requirements. For the many broadcasters that provide exemplary local service, these measures would provide a significant opportunity to demonstrate to their communities of license – as well as to those engaged in spectrum policy – that their use of the valuable public airwaves remains an important and effective one.

Finally, later that day, Ms. Leanza met with Joshua Cinelli, Media Advisor to Commissioner Michael Copps. She stressed the importance of obtaining disclosure in a timely way, with a final order in March 2012 and online public files and program disclosure obligations in operation by June 2012.

In accordance with the Commission's rules, this *ex parte* notice is being filed electronically in the above referenced dockets. If you have any questions regarding this filing please do not hesitate to contact me.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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Cc:  
Edward Lazarus  
Sherrese Smith  
Jessica Almond  
Joshua Cinelli

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<sup>1</sup> *The Information Needs of Communities*, FCC Staff Report, GN Dkt 10-25 (June 9, 2011).